

Plan Evaluation Form

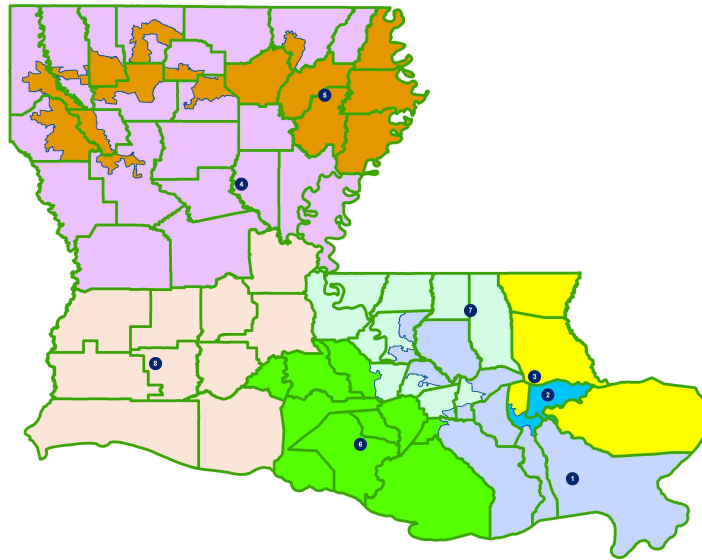
Plan Type: BESE - Public Submission

Plan Name: NAACP Option 1

Plan Submitted By:

Question	Response/Quantify or Explain if necessary
If a statewide plan (House, Senate, PSC, BESE, Congress, or Supreme Court), does the plan assign all the geography of the state?	Yes
Is each district within the plan composed of contiguous geography?	No (See attachment - Compactness Report)
If a House, Senate, PSC, BESE, or Congressional Plan, is the plan comprised of single-member districts? For House and Senate Plans, give the # of districts if less than the current number.	Yes (See attachment - Plan Statistics)
What is the overall deviation of the plan?	Absolute=48,314 Relative=8.3% (See attachment - Plan Statistics)
How many majority-minority districts are contained within the plan? List each minority district, quantify by type of protected class, list Tot Pop %, VAP %, Vot Reg %, and describe where in the state each minority district is located.	2 (See attachment - District Population)
How many parishes are split in the plan? Please list. Include any explanation given for each split.	18 (See attachment - Split Parishes)
How many municipalities are split in the plan? Please list. Include any explanation given for each split.	31 (See attachment - Split Places)
How many VTDs (precincts) are split in the plan?	2 (See attachment - Split VTDs)
If there are split VTD's, are they split using visible census tabulation boundaries?	See other observations
Please list each split VTD by Parish and VTD in alpha and numeric order and include the number of districts each VTD is split into and also specify the district numbers. Include any explanation given for each split.	See attachment - Split VTDs
Any other observations regarding the plan?	

Snapshot Report



Date: January 19, 2022
Time: 12:32 PM

Compactness Report

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Plan: NAACP Option 1

Plan Type: BESE - Public Submission

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District	Part	Area (sq miles)	Perimeter	Normalized Area	Reock	Schwartzberg	Holes
District 1	1	6148.47	704.7	0.1556	0.2724	2.54	0
District 2	1	456.07	166.14	0.2076	0.3255	2.19	0
District 3	1	4069.55	518.36	0.1903	0.3161	2.29	0
District 4	1	15396.07	1865.8	0.0556	0.4911	4.24	0
District 5	1	5923.3	1409.08	0.0375	0.2332	5.16	0
District 5	2	0	0.29	0.1619	0.0705	2.49	0
District 6	1	6218.53	448.57	0.3884	0.4106	1.6	0
District 7	1	3878.14	608.62	0.1316	0.4043	2.76	0
District 8	1	10312.62	658.47	0.2989	0.4633	1.83	0

Plan Statistics

Districts:	# of Members	Actual Population	Ideal Population	Absolute Deviation	Relative Deviation
District 1	1	606,007	582,219	23,788	4.086%
District 2	1	577,285	582,219	-4,934	-0.847%
District 3	1	586,038	582,219	3,819	0.656%
District 4	1	575,569	582,219	-6,650	-1.142%
District 5	1	557,693	582,219	-24,526	-4.213%
District 6	1	582,785	582,219	566	0.097%
District 7	1	588,911	582,219	6,692	1.149%
District 8	1	583,469	582,219	1,250	0.215%
Grand Total:	8	4,657,757	4,657,752		

Ideal Population Per Member:	582219			Ideal - Actual:	-5
Number of Districts for Plan Type:	8			Remainder:	5
Range of District Populations:	557,693	to	606,007	Unassigned Population:	0
Absolute Mean Deviation:	6,039				
Absolute Range:	-24,526	to	23,788		
Absolute Overall Range:	48,314				
Relative Mean Deviation:	1.55%				
Relative Range:	-4.21%	to	4.09%		
Relative Overall Range:	8.30%				

District Population

	Total Population	Total White	Total Black	Total Asian	Total Other	Total Hispanic	VAP Total	VAP White	VAP Black	VAP Asian	VAP Other	VAP Hispanic Total	Reg Total Dec 2021	Reg White Dec 2021	Reg Black Dec 2021	Reg Other Dec 2021
District 1																
Ascension	101,132	73,410	16,731	2,107	7,161	8,243	73,272	54,821	11,241	1,369	4,651	5,237	63,764	51,106	9,036	3,622
East Baton Rouge	199,353	137,331	38,995	9,128	11,118	12,717	159,364	113,295	28,832	6,845	8,200	9,224	131,837	101,768	21,436	8,633
Jefferson	15,252	10,591	2,329	651	1,099	1,475	11,656	8,297	1,651	475	802	1,024	10,196	7,842	1,457	897
Lafourche	65,244	51,410	5,892	666	3,569	4,289	49,649	40,591	3,798	472	2,358	2,771	39,305	34,512	2,733	2,060
Livingston	142,282	116,855	12,658	1,697	7,961	8,791	105,141	88,432	8,136	1,099	5,163	5,390	84,568	76,062	5,425	3,081
Plaquemines	23,515	14,287	5,428	1,317	1,786	2,236	17,334	10,856	3,857	925	1,196	1,377	13,908	9,513	3,134	1,261
St. Charles	52,549	33,550	13,928	837	3,309	4,141	39,541	26,154	9,890	529	2,301	2,737	34,985	24,309	8,797	1,879
St. James	3,403	2,162	1,132	9	77	70	2,725	1,762	888	7	51	37	2,570	1,604	924	42
St. John the Baptist	3,277	1,804	1,045	21	335	406	2,592	1,549	761	18	213	247	2,188	1,456	609	123
District 1	606,007	441,400	98,138	16,433	36,415	42,368	461,274	345,757	69,054	11,739	24,935	28,044	383,321	308,172	53,551	21,598
	100.000%	72.837%	16.194%	2.712%	6.009%	6.991%	100.000%	74.957%	14.970%	2.545%	5.406%	6.080%	83.100%	80.395%	13.970%	5.634%
District 2																
Jefferson	193,288	62,411	92,660	10,975	24,098	30,489	146,857	51,743	67,544	8,616	16,533	20,715	110,999	41,649	55,034	14,316
Orleans	383,997	126,462	218,969	12,856	22,044	31,017	306,196	110,252	166,068	10,520	16,408	23,156	256,244	91,986	141,525	22,733
District 2	577,285	188,873	311,629	23,831	46,142	61,506	453,053	161,995	233,612	19,136	32,941	43,871	367,243	133,635	196,559	37,049
	100.000%	32.717%	53.982%	4.128%	7.993%	10.654%	100.000%	35.756%	51.564%	4.224%	7.271%	9.683%	81.060%	36.389%	53.523%	10.088%
District 3																
Jefferson	232,241	147,933	31,228	11,398	37,722	47,093	186,141	124,095	22,980	8,601	27,482	33,745	141,906	110,125	13,085	18,696
St. Bernard	43,764	24,497	12,309	1,381	4,630	6,010	31,775	18,992	7,944	982	3,169	4,028	25,653	18,233	5,497	1,923
St. Tammany	264,570	196,641	38,643	5,774	17,852	20,844	202,228	154,621	26,761	4,075	12,610	14,310	178,779	145,724	21,142	11,913
Washington	45,463	29,943	13,434	216	1,134	1,410	34,951	23,743	9,732	154	761	901	27,587	18,835	8,102	650
District 3	586,038	399,014	95,614	18,769	61,338	75,357	455,095	321,451	67,417	13,812	44,022	52,984	373,925	292,917	47,826	33,182
	100.000%	68.087%	16.315%	3.203%	10.467%	12.859%	100.000%	70.634%	14.814%	3.035%	9.673%	11.642%	82.164%	78.336%	12.790%	8.874%
District 4																
Bienville	4,914	3,705	999	43	58	63	3,757	2,822	796	24	37	35	3,253	2,497	725	31
Bossier	92,703	67,369	15,877	2,346	4,535	5,524	69,341	51,498	11,344	1,585	2,984	3,463	55,210	44,005	8,290	2,915
Caddo	43,960	31,578	9,131	336	1,575	1,611	34,433	25,377	6,779	235	1,049	990	28,435	21,596	5,763	1,076
Caldwell	9,645	7,646	1,632	51	166	221	7,478	5,969	1,224	46	123	163	6,031	5,124	818	89
Catahoula	8,906	5,776	2,395	46	570	614	6,951	4,557	1,736	33	538	558	6,467	4,639	1,770	58
Claiborne	8,638	5,338	2,923	51	206	385	7,261	4,682	2,285	28	175	341	4,805	3,190	1,543	72
Concordia	18,687	10,275	7,725	122	332	459	14,217	8,108	5,613	100	229	310	11,964	7,222	4,540	202
De Soto	13,981	10,897	2,116	52	460	465	10,574	8,341	1,569	36	282	291	9,984	8,146	1,526	312
Grant	22,169	17,709	3,335	133	348	1,333	17,527	13,964	2,717	97	242	1,179	12,688	11,174	1,176	338
Jackson	10,449	7,970	1,805	138	379	385	8,219	6,394	1,283	118	315	316	6,143	5,148	875	120
La Salle	14,791	11,348	1,422	283	1,366	1,402	11,563	8,636	1,065	264	1,327	1,325	8,792	7,978	637	177

District Population

	Total Population	Total White	Total Black	Total Asian	Total Other	Total Hispanic	VAP Total	VAP White	VAP Black	VAP Asian	VAP Other	VAP Hispanic Total	Reg Total Dec 2021	Reg White Dec 2021	Reg Black Dec 2021	Reg Other Dec 2021
District 4																
Lincoln	27,482	20,807	4,618	626	970	1,169	22,115	16,975	3,630	507	637	789	15,495	12,901	2,043	551
Morehouse	8,679	6,666	1,625	59	136	141	6,944	5,392	1,262	40	117	102	6,376	5,007	1,250	119
Natchitoches	23,550	16,115	5,697	187	845	740	18,549	13,043	4,165	137	640	477	15,842	11,582	3,488	772
Rapides	130,023	77,510	42,592	2,428	4,391	5,090	98,792	61,373	30,205	1,786	3,094	3,442	80,176	52,832	23,775	3,569
Red River	3,771	3,067	514	10	62	91	2,890	2,425	339	2	49	53	2,670	2,316	314	40
Sabine	22,155	15,036	3,861	94	441	710	17,064	12,054	2,655	66	319	502	14,547	11,023	2,184	1,340
Union	21,107	14,460	5,224	62	1,023	1,135	16,632	11,807	3,861	39	671	709	15,221	11,066	3,692	463
Vernon	48,750	35,087	7,611	1,442	3,010	4,175	36,261	26,765	5,133	1,074	2,129	2,740	24,060	19,182	3,011	1,867
Webster	17,703	12,953	3,994	103	312	293	13,759	10,273	2,919	79	218	197	10,897	8,453	2,240	204
West Carroll	9,751	7,894	1,425	27	225	325	7,532	6,223	1,010	20	143	192	7,038	5,913	1,040	85
Winn	13,755	8,594	3,727	210	961	1,023	10,906	6,932	2,695	170	902	941	8,406	5,988	2,292	126
District 4	575,569	397,800	130,248	8,849	22,371	27,354	442,765	313,610	94,285	6,486	16,220	19,115	354,500	266,982	72,992	14,526
	100.000%	69.114%	22.629%	1.537%	3.887%	4.753%	100.000%	70.830%	21.295%	1.465%	3.663%	4.317%	80.065%	75.312%	20.590%	4.098%
District 5																
Bienville	8,067	3,245	4,601	14	109	148	6,316	2,664	3,488	6	74	106	5,594	2,346	3,192	56
Bossier	36,043	13,683	16,674	1,146	3,843	4,713	26,535	11,433	11,096	863	2,596	3,156	14,533	6,856	6,548	1,129
Caddo	193,888	71,879	110,173	3,698	5,638	6,770	147,974	59,682	79,580	2,773	3,974	4,628	122,861	51,517	65,486	5,858
Claiborne	5,532	1,925	3,437	37	68	94	4,246	1,576	2,539	27	55	62	3,793	1,442	2,277	74
De Soto	12,831	4,387	7,857	65	238	297	9,866	3,568	5,856	50	181	204	8,729	3,184	5,284	261
East Carroll	7,459	2,054	5,272	29	61	115	5,901	1,773	4,043	19	39	80	4,709	1,306	3,359	44
Franklin	19,774	12,492	6,802	70	205	276	15,028	9,901	4,779	44	151	183	13,159	9,015	4,034	110
Jackson	4,582	1,997	2,361	37	89	83	3,564	1,573	1,842	22	62	56	3,306	1,499	1,735	72
Lincoln	20,914	5,227	14,746	266	474	585	16,540	4,331	11,489	237	323	398	10,154	2,771	6,973	410
Madison	10,017	3,475	6,363	20	100	204	7,435	2,906	4,391	9	81	149	7,278	2,494	4,674	110
Morehouse	16,950	5,615	10,859	101	198	240	13,118	4,703	8,038	77	154	190	10,546	3,498	6,881	167
Natchitoches	13,965	3,246	10,028	68	468	750	10,800	2,967	7,250	61	403	663	7,265	1,268	5,736	261
Ouachita	160,368	88,545	61,217	2,788	5,157	5,658	120,200	69,974	42,290	2,118	3,759	3,946	99,752	60,515	35,658	3,579
Red River	3,849	1,128	2,592	15	61	97	2,824	913	1,825	1	44	60	2,961	814	2,104	43
Richland	20,043	11,785	7,603	83	314	400	15,383	9,338	5,546	66	230	293	13,662	8,470	4,961	231
Tensas	4,147	1,744	2,312	23	42	67	3,235	1,446	1,728	12	26	46	3,455	1,503	1,917	35
Webster	19,264	9,782	8,685	105	346	395	14,994	7,871	6,545	75	215	237	11,840	6,485	5,099	256
District 5	557,693	242,209	281,582	8,565	17,411	20,892	423,959	196,619	202,325	6,460	12,367	14,457	343,597	164,983	165,918	12,696
	100.000%	43.431%	50.491%	1.536%	3.122%	3.746%	100.000%	46.377%	47.723%	1.524%	2.917%	3.410%	81.045%	48.016%	48.289%	3.695%
District 6																
Assumption	21,039	13,722	6,220	96	743	914	16,616	11,145	4,707	57	510	631	14,439	9,700	4,510	229

District Population

	Total Population	Total White	Total Black	Total Asian	Total Other	Total Hispanic	VAP Total	VAP White	VAP Black	VAP Asian	VAP Other	VAP Hispanic Total	Reg Total Dec 2021	Reg White Dec 2021	Reg Black Dec 2021	Reg Other Dec 2021
District 6																
Iberia	69,929	39,206	24,556	2,123	3,250	3,897	52,791	31,295	17,069	1,562	2,284	2,657	44,526	28,287	14,352	1,887
Iberville	6,998	4,761	2,003	19	116	158	5,667	3,899	1,579	14	96	128	5,449	3,610	1,756	83
Lafayette	241,753	153,363	65,136	6,454	13,590	15,983	183,875	121,608	45,917	4,664	9,299	10,829	153,493	108,645	36,481	8,367
Lafourche	32,313	20,300	9,963	359	1,174	1,383	24,970	16,247	7,279	266	831	972	18,973	13,955	4,431	587
St. Martin	51,767	33,259	15,921	597	1,451	1,679	39,404	26,278	11,293	407	1,013	1,144	35,120	23,934	10,381	805
St. Mary	49,406	26,949	15,991	835	3,961	4,524	37,521	21,594	11,520	593	2,641	2,954	30,210	18,712	9,891	1,607
Terrebonne	109,580	69,934	23,147	1,743	6,119	7,358	82,505	55,631	15,796	1,239	4,089	4,701	61,720	45,395	11,566	4,759
District 6	582,785	361,494	162,937	12,226	30,404	35,896	443,349	287,697	115,160	8,802	20,763	24,016	363,930	252,238	93,368	18,324
	100.000%	62.029%	27.958%	2.098%	5.217%	6.159%	100.000%	64.892%	25.975%	1.985%	4.683%	5.417%	82.087%	69.309%	25.655%	5.035%
District 7																
Ascension	25,368	7,731	15,485	193	1,678	2,140	18,685	6,315	10,898	145	1,127	1,424	16,153	5,694	9,778	681
East Baton Rouge	257,428	58,738	174,403	7,297	15,044	17,834	196,248	50,586	127,958	5,754	10,395	12,315	147,427	36,464	103,239	7,724
East Feliciana	19,539	11,516	7,341	91	329	391	16,183	9,740	5,918	61	266	317	13,600	7,959	5,186	455
Iberville	23,243	10,072	11,727	183	1,086	1,260	18,419	8,563	8,653	135	926	1,059	15,013	6,522	8,141	350
Pointe Coupee	20,758	12,395	7,504	107	593	625	16,250	10,108	5,502	91	430	429	14,675	9,320	5,121	234
St. Helena	10,920	4,527	6,031	39	189	216	8,463	3,805	4,371	28	150	149	8,321	3,628	4,565	128
St. James	16,789	7,811	8,630	51	238	273	12,780	6,121	6,409	24	179	200	12,396	5,650	6,577	169
St. John the Baptist	39,200	12,073	24,151	382	2,201	2,885	29,911	10,073	17,676	305	1,558	1,963	26,725	8,763	16,625	1,337
Tangipahoa	133,157	81,336	41,879	1,474	6,014	7,242	101,491	65,205	29,217	1,100	4,142	4,840	76,256	52,912	20,525	2,819
West Baton Rouge	27,199	14,307	11,170	287	1,109	1,244	20,526	11,146	8,149	209	803	871	17,141	9,937	6,865	339
West Feliciana	15,310	10,883	3,740	89	373	651	12,783	9,283	2,951	56	319	572	7,407	5,092	2,180	135
District 7	588,911	231,389	312,061	10,193	28,854	34,761	451,739	190,945	227,702	7,908	20,295	24,139	355,114	151,941	188,802	14,371
	100.000%	39.291%	52.990%	1.731%	4.900%	5.903%	100.000%	42.269%	50.406%	1.751%	4.493%	5.344%	78.610%	42.787%	53.167%	4.047%
District 8																
Acadia	57,576	44,480	10,864	238	1,421	1,641	42,943	34,071	7,383	173	916	1,026	37,678	30,555	6,407	716
Allen	22,750	16,327	4,490	246	740	1,893	17,510	12,751	3,275	182	656	1,755	12,201	9,478	2,217	506
Avoyelles	39,693	25,625	11,678	434	1,189	1,485	30,578	20,269	8,311	379	1,049	1,257	23,426	16,534	6,294	598
Beauregard	36,549	29,529	4,649	402	917	1,271	27,489	22,304	3,495	269	648	828	22,294	18,771	2,369	1,154
Calcasieu	216,785	139,772	59,386	4,702	9,389	11,384	163,166	108,789	41,898	3,359	6,516	7,570	120,511	85,659	29,513	5,339
Cameron	5,617	5,232	125	30	155	197	4,358	4,100	79	23	109	130	4,789	4,610	88	91
Evangeline	32,350	21,354	9,235	241	1,240	1,336	24,408	16,460	6,483	187	1,061	1,111	20,553	14,566	5,643	344
Jefferson Davis	32,250	25,066	5,837	183	692	734	24,039	19,121	4,006	111	476	489	20,013	16,350	3,202	461
St. Landry	82,540	43,611	35,836	499	1,958	2,178	61,811	34,209	25,497	353	1,301	1,374	54,482	30,093	23,005	1,384
Vermilion	57,359	44,477	8,810	1,447	2,002	2,296	43,012	34,363	5,787	1,037	1,337	1,496	36,769	30,505	4,994	1,270
District 8	583,469	395,473	150,910	8,422	19,703	24,415	439,314	306,437	106,214	6,073	14,069	17,036	352,716	257,121	83,732	11,863
	100.000%	67.780%	25.864%	1.443%	3.377%	4.184%	100.000%	69.754%	24.177%	1.382%	3.202%	3.878%	80.288%	72.897%	23.739%	3.363%

District Population

Plan: NAACP Option 1

	Total Population	Total White	Total Black	Total Asian	Total Other	Total Hispanic	VAP Total	VAP White	VAP Black	VAP Asian	VAP Other	VAP Hispanic Total	Reg Total Dec 2021	Reg White Dec 2021	Reg Black Dec 2021	Reg Other Dec 2021
Grand Total	4,657,757 100.000%	2,657,652 57.059%	1,543,119 33.130%	107,288 2.303%	262,638 5.639%	322,549 6.925%	3,570,548 100.000%	2,124,511 59.501%	1,115,769 31.249%	80,416 2.252%	185,612 5.198%	223,662 6.264%	2,894,346 81.062%	1,827,989 63.157%	902,748 31.190%	163,609 5.653%

Split Parishes

DR: I A 2020 12 - CENSUS

Plan: NAACP Option 1

Plan Type: BESE - Public Submission

	Total Population	Total White	Total Black	Total Asian	Total Other	Total Hispanic	VAP Total	VAP White	VAP Black	VAP Asian	VAP Other	VAP Hispanic Total	Reg Total Dec 2021	Reg White Dec 2021	Reg Black Dec 2021	Reg Other Dec 2021
District 1																
Ascension	101,132	73,410	16,731	2,107	7,161	8,243	73,272	54,821	11,241	1,369	4,651	5,237	63,764	51,106	9,036	3,622
East Baton Rouge	199,353	137,331	38,995	9,128	11,118	12,717	159,364	113,295	28,832	6,845	8,200	9,224	131,837	101,768	21,436	8,633
Jefferson	15,252	10,591	2,329	651	1,099	1,475	11,656	8,297	1,651	475	802	1,024	10,196	7,842	1,457	897
Lafourche	65,244	51,410	5,892	666	3,569	4,289	49,649	40,591	3,798	472	2,358	2,771	39,305	34,512	2,733	2,060
St. James	3,403	2,162	1,132	9	77	70	2,725	1,762	888	7	51	37	2,570	1,604	924	42
St. John the Baptist	3,277	1,804	1,045	21	335	406	2,592	1,549	761	18	213	247	2,188	1,456	609	123
District 2																
Jefferson	193,288	62,411	92,660	10,975	24,098	30,489	146,857	51,743	67,544	8,616	16,533	20,715	110,999	41,649	55,034	14,316
District 3																
Jefferson	232,241	147,933	31,228	11,398	37,722	47,093	186,141	124,095	22,980	8,601	27,482	33,745	141,906	110,125	13,085	18,696
District 4																
Bienville	4,914	3,705	999	43	58	63	3,757	2,822	796	24	37	35	3,253	2,497	725	31
Bossier	92,703	67,369	15,877	2,346	4,535	5,524	69,341	51,498	11,344	1,585	2,984	3,463	55,210	44,005	8,290	2,915
Caddo	43,960	31,578	9,131	336	1,575	1,611	34,433	25,377	6,779	235	1,049	990	28,435	21,596	5,763	1,076
Claiborne	8,638	5,338	2,923	51	206	385	7,261	4,682	2,285	28	175	341	4,805	3,190	1,543	72
De Soto	13,981	10,897	2,116	52	460	465	10,574	8,341	1,569	36	282	291	9,984	8,146	1,526	312
Jackson	10,449	7,970	1,805	138	379	385	8,219	6,394	1,283	118	315	316	6,143	5,148	875	120
Lincoln	27,482	20,807	4,618	626	970	1,169	22,115	16,975	3,630	507	637	789	15,495	12,901	2,043	551
Morehouse	8,679	6,666	1,625	59	136	141	6,944	5,392	1,262	40	117	102	6,376	5,007	1,250	119
Natchitoches	23,550	16,115	5,697	187	845	740	18,549	13,043	4,165	137	640	477	15,842	11,582	3,488	772
Red River	3,771	3,067	514	10	62	91	2,890	2,425	339	2	49	53	2,670	2,316	314	40
Webster	17,703	12,953	3,994	103	312	293	13,759	10,273	2,919	79	218	197	10,897	8,453	2,240	204
District 5																
Bienville	8,067	3,245	4,601	14	109	148	6,316	2,664	3,488	6	74	106	5,594	2,346	3,192	56
Bossier	36,043	13,683	16,674	1,146	3,843	4,713	26,535	11,433	11,096	863	2,596	3,156	14,533	6,856	6,548	1,129
Caddo	193,888	71,879	110,173	3,698	5,638	6,770	147,974	59,682	79,580	2,773	3,974	4,628	122,861	51,517	65,486	5,858
Claiborne	5,532	1,925	3,437	37	68	94	4,246	1,576	2,539	27	55	62	3,793	1,442	2,277	74
De Soto	12,831	4,387	7,857	65	238	297	9,866	3,568	5,856	50	181	204	8,729	3,184	5,284	261
Jackson	4,582	1,997	2,361	37	89	83	3,564	1,573	1,842	22	62	56	3,306	1,499	1,735	72
Lincoln	20,914	5,227	14,746	266	474	585	16,540	4,331	11,489	237	323	398	10,154	2,771	6,973	410
Morehouse	16,950	5,615	10,859	101	198	240	13,118	4,703	8,038	77	154	190	10,546	3,498	6,881	167
Natchitoches	13,965	3,246	10,028	68	468	750	10,800	2,967	7,250	61	403	663	7,265	1,268	5,736	261
Red River	3,849	1,128	2,592	15	61	97	2,824	913	1,825	1	44	60	2,961	814	2,104	43
Webster	19,264	9,782	8,685	105	346	395	14,994	7,871	6,545	75	215	237	11,840	6,485	5,099	256

Split Parishes

	Total Population	Total White	Total Black	Total Asian	Total Other	Total Hispanic	VAP Total	VAP White	VAP Black	VAP Asian	VAP Other	VAP Hispanic Total	Reg Total Dec 2021	Reg White Dec 2021	Reg Black Dec 2021	Reg Other Dec 2021
District 6																
Iberville	6,998	4,761	2,003	19	116	158	5,667	3,899	1,579	14	96	128	5,449	3,610	1,756	83
Lafourche	32,313	20,300	9,963	359	1,174	1,383	24,970	16,247	7,279	266	831	972	18,973	13,955	4,431	587
District 7																
Ascension	25,368	7,731	15,485	193	1,678	2,140	18,685	6,315	10,898	145	1,127	1,424	16,153	5,694	9,778	681
East Baton Rouge	257,428	58,738	174,403	7,297	15,044	17,834	196,248	50,586	127,958	5,754	10,395	12,315	147,427	36,464	103,239	7,724
Iberville	23,243	10,072	11,727	183	1,086	1,260	18,419	8,563	8,653	135	926	1,059	15,013	6,522	8,141	350
St. James	16,789	7,811	8,630	51	238	273	12,780	6,121	6,409	24	179	200	12,396	5,650	6,577	169
St. John the Baptist	39,200	12,073	24,151	382	2,201	2,885	29,911	10,073	17,676	305	1,558	1,963	26,725	8,763	16,625	1,337

Time: 12:32 PM

Split Places

Plan Type: BESE - Public Submission

Plan: NAACP Option 1

Page: 1 of 4

	Total Population	Total White	Total Black	Total Asian	Total Other	Total Hispanic	VAP Total	VAP White	VAP Black	VAP Asian	VAP Other	VAP Hispanic Total	Reg Total Dec 2021	Reg White Dec 2021	Reg Black Dec 2021	Reg Other Dec 2021
District 1																
Ascension																
Gonzales	4,112	2,003	1,667	54	326	394	3,134	1,620	1,192	46	231	270	2,493	1,442	881	158
East Baton Rouge																
Baton Rouge	70,467	48,551	14,559	3,026	3,435	4,045	58,659	41,401	11,359	2,476	2,718	3,160	45,499	34,228	8,225	3,035
Central	28,299	22,990	3,155	330	1,260	1,316	21,302	17,783	2,037	214	825	842	19,363	17,067	1,724	571
Gardere	533	125	315	14	68	82	401	105	220	14	51	59	297	192	72	35
Zachary	13	8	0	0	2	4	10	8	0	0	2	4	8	6	1	0
Jefferson																
Estelle	5,700	3,481	1,282	267	474	648	4,316	2,713	920	178	359	451	3,684	2,411	858	418
Lafourche																
Chackbay	1,985	1,805	91	3	52	54	1,516	1,416	40	3	33	37	1,268	1,225	11	33
Thibodaux	533	442	54	4	22	29	450	380	43	2	16	23	379	353	16	17
St. John the Baptist																
Laplace	3,031	1,602	1,020	21	325	394	2,387	1,379	740	18	207	240	2,057	1,332	607	121
District 2																
Jefferson																
Estelle	12,252	5,477	4,095	902	1,486	1,866	9,140	4,374	2,843	694	1,009	1,230	7,248	3,704	2,525	1,014
Kenner	12,428	2,070	6,693	104	3,375	4,056	9,098	1,636	4,983	86	2,260	2,726	6,418	1,167	4,560	691
Metairie	1,960	58	1,803	3	92	126	1,528	38	1,429	0	59	67	1,540	20	1,460	60
River Ridge	2,315	799	1,209	45	221	287	1,882	687	985	34	149	184	1,296	475	737	84
District 3																
Jefferson																
Kenner	54,020	27,673	9,131	3,534	12,751	15,885	42,101	22,828	6,530	2,647	9,398	11,498	31,269	19,815	4,371	7,089
Metairie	141,547	93,648	16,860	6,712	21,927	27,318	113,370	78,562	12,193	5,043	15,759	19,369	85,873	69,961	6,115	9,793
River Ridge	11,276	9,505	562	206	845	1,084	9,222	7,876	441	150	639	793	8,603	7,839	238	529
District 4																
Bienville																
Bienville	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Bossier																
Bossier City	30,821	21,505	5,657	1,149	1,706	2,208	23,361	16,926	3,864	808	1,144	1,413	18,357	14,256	2,808	1,302
Haughton	4,539	3,220	917	55	184	211	3,236	2,350	613	43	112	128	2,382	1,904	415	72
Shreveport	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Caddo																

Split Places

	Total Population	Total White	Total Black	Total Asian	Total Other	Total Hispanic	VAP Total	VAP White	VAP Black	VAP Asian	VAP Other	VAP Hispanic Total	Reg Total Dec 2021	Reg White Dec 2021	Reg Black Dec 2021	Reg Other Dec 2021
District 4																
Greenwood	3,151	1,952	915	39	155	158	2,564	1,664	681	26	119	105	2,396	1,537	742	117
Shreveport	567	344	180	10	21	21	435	286	121	7	11	13	357	244	95	13
Claiborne																
Homer	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
De Soto																
Gloster	36	26	6	0	4	7	27	22	4	0	1	3	25	23	2	0
Keachi	239	190	38	0	7	6	192	150	35	0	4	5	207	175	32	7
Jackson																
Hodge	195	132	48	6	5	3	132	99	27	3	2	1	146	117	26	3
Jonesboro	2,729	1,371	975	102	244	255	2,179	1,117	706	98	232	239	1,411	982	396	27
Lincoln																
Grambling	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Ruston	12,463	8,654	2,792	484	340	495	10,555	7,577	2,180	395	243	377	5,430	4,170	980	285
Morehouse																
Bastrop	151	87	59	4	0	0	129	78	48	2	0	0	136	97	36	2
Natchitoches																
Clarence	36	21	13	0	2	1	27	16	9	0	2	1	29	16	8	5
Natchitoches	6,557	4,117	2,006	86	217	230	5,295	3,434	1,522	63	168	151	4,610	3,068	1,301	238
Red River																
Coushatta	39	5	33	0	1	0	31	5	25	0	1	0	34	28	5	1
Webster																
Minden	3,238	2,549	561	37	56	72	2,465	1,967	398	31	43	52	1,994	1,692	251	48
District 5																
Bienville																
Bienville	191	125	64	0	2	0	146	90	54	0	2	0	175	90	83	1
Bossier																
Bossier City	31,880	11,525	15,101	966	3,684	4,487	23,262	9,642	9,963	711	2,473	2,982	12,968	5,884	6,038	1,049
Haughton	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Shreveport	2,908	1,330	1,203	176	139	200	2,330	1,170	843	150	115	161	726	455	219	51
Caddo																
Greenwood	15	0	12	0	3	2	12	0	10	0	2	2	7	0	5	0
Shreveport	184,118	65,835	107,091	3,577	5,317	6,437	140,198	54,691	77,263	2,685	3,746	4,392	116,442	48,038	62,887	5,561

Split Places

	Total Population	Total White	Total Black	Total Asian	Total Other	Total Hispanic	VAP Total	VAP White	VAP Black	VAP Asian	VAP Other	VAP Hispanic Total	Reg Total Dec 2021	Reg White Dec 2021	Reg Black Dec 2021	Reg Other Dec 2021
District 5																
Claiborne																
Homer	2,747	711	1,955	26	23	41	2,038	603	1,375	18	20	28	1,723	559	1,126	40
De Soto																
Gloster	17	10	2	0	4	4	14	10	1	0	3	3	11	5	4	0
Keachi	4	3	1	0	0	0	2	2	0	0	0	0	1	0	0	0
Jackson																
Hodge	187	77	100	1	3	7	159	68	85	1	3	4	132	45	80	7
Jonesboro	1,377	175	1,175	4	17	12	1,026	140	873	3	7	10	870	87	767	13
Lincoln																
Grambling	5,239	41	5,156	12	19	36	4,515	31	4,455	6	16	31	2,073	177	1,836	67
Ruston	9,703	2,762	6,405	225	211	268	7,497	2,374	4,672	209	165	208	4,736	1,233	3,291	214
Morehouse																
Bastrop	9,540	1,841	7,507	47	64	97	7,044	1,547	5,358	36	37	66	5,851	1,336	4,412	91
Natchitoches																
Clarence	290	48	236	0	3	1	227	43	179	0	3	0	255	49	205	4
Natchitoches	11,482	2,573	8,343	63	398	680	8,889	2,424	5,988	58	342	607	5,516	870	4,432	218
Red River																
Coushatta	1,713	470	1,183	8	33	55	1,250	402	810	1	23	37	1,283	313	946	30
Webster																
Minden	8,690	2,470	6,018	42	77	112	6,674	2,018	4,501	32	47	68	5,133	1,698	3,331	117
District 6																
Iberville																
Plaquemine	110	82	24	1	3	4	75	58	13	1	3	4	78	49	28	0
Lafourche																
Chackbay	3,385	2,966	226	23	130	120	2,456	2,211	120	14	84	77	2,169	2,061	67	43
Thibodaux	15,415	8,255	6,244	154	563	710	12,367	6,936	4,761	117	422	525	8,671	5,724	2,688	253
District 7																
Ascension																
Gonzales	8,119	2,641	4,326	80	910	1,184	6,091	2,231	3,063	64	619	795	4,682	1,746	2,617	330
East Baton Rouge																
Baton Rouge	157,003	31,440	111,538	5,221	7,769	9,473	121,581	28,239	82,702	4,173	5,599	6,840	87,287	18,139	64,249	4,883
Central	1,266	628	568	27	34	33	913	475	394	18	19	16	934	497	396	41

Date: January 19, 2022

Time: 12:32 PM

Split Places

DR: LA 2020 12 - CENSUS

Plan: NAACP Option 1

Plan Type: BESE - Public Submission

	Total Population	Total White	Total Black	Total Asian	Total Other	Total Hispanic	VAP Total	VAP White	VAP Black	VAP Asian	VAP Other	VAP Hispanic Total	Reg Total Dec 2021	Reg White Dec 2021	Reg Black Dec 2021	Reg Other Dec 2021
District 7																
East Baton Rouge																
Gardere	12,670	2,997	6,336	516	2,662	3,082	9,088	2,537	4,374	410	1,665	1,912	4,856	1,260	3,172	425
Zachary	19,303	9,144	9,040	362	506	557	13,603	6,731	6,093	232	361	365	12,436	6,316	5,642	481
Iberville																
Plaquemine	6,159	2,830	3,041	62	162	205	4,720	2,334	2,172	45	115	138	4,405	2,100	2,199	90
St. John the Baptist																
Laplace	25,810	8,007	15,384	333	1,803	2,325	19,505	6,668	11,088	275	1,265	1,568	16,669	5,797	9,772	1,098

Date: January 19, 2022

Time: 12:32 PM

Split VTDs

DR: I A 2020 12 - CENSUS

Plan: NAACP Option 1

Plan Type: BESE - Public Submission

	Total Population	Total White	Total Black	Total Asian	Total Other	Total Hispanic	VAP Total	VAP White	VAP Black	VAP Asian	VAP Other	VAP Hispanic Total	Reg Total Dec 2021	Reg White Dec 2021	Reg Black Dec 2021	Reg Other Dec 2021
District 4																
Caddo																
106	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
122	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
District 5																
Caddo																
106	2,566	820	1,607	11	84	72	1,907	673	1,132	11	59	47	1,482	493	934	55
122	3,910	519	3,291	20	60	58	3,082	447	2,567	19	35	33	2,044	278	1,700	66

From: Victoria Wenger <vwenger@naacpldf.org>
Sent: Monday, January 10, 2022 3:38 PM
To: Sen. & Gov Affairs Cmte; House & Governmental Affairs
Subject: Written Testimony: BESE Compliance with Section 2 of the Voting Rights Act
Attachments: 2022.01.10 Louisiana BESE Redistricting Letter.pdf; LA_BESE_Option1_BlockEquiv.csv; LA_BESE_Option2_BlockEquiv.csv

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Committee Members,

Attached, please find written testimony urging the adoption of a map for the Louisiana Board of Elementary and Secondary Education ("BESE") with three districts comprised of a majority of minority voters ("majority-minority districts"). Block equivalency files for two such map options are attached as well.

This testimony is submitted on behalf of the NAACP Legal Defense and Educational Fund, Inc. ("LDF"), Advancement Project National Office, American Civil Liberties Union of Louisiana, Black Voters Matter Fund, Fair Districts Louisiana, The Education Trust, League of Women Voters of Louisiana, Louisiana NAACP State Conference, Louisiana Progress, Our Voice Nuestra Voz, Power Coalition for Equity and Justice, Southern Louisiana Coalition for Education, Southern Poverty Law Center Action Fund, Urban League of Louisiana, and former BESE member Linda Johnson.

Thank you for your consideration.

Sincerely,



Victoria Wenger

Attorney | Pronouns: she/her

NAACP Legal Defense and Educational Fund, Inc.

40 Rector Street, 5th Floor, New York, NY 10006

■ t 212.965.2267 ■ c 646-385-0471 ■ vwenger@naacpldf.org

www.naacpldf.org  

LDF

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Urban League of
Louisiana



FAIR
DISTRICTS
LOUISIANA



The Education Trust

LOUISIANA
PROGRESS



ADVANCEMENT
PROJECT



South Louisiana Coalition for Education



LEAGUE OF WOMEN VOTERS'
OF LOUISIANA

SPLC ACTION



OUR VOICE
nuestra voz

January 10, 2022

Sent via email

Senate and House Governmental Affairs Committees
Louisiana State Senate
P.O. Box 94183
Baton Rouge, LA 70804
s&g@legis.la.gov
h&ga@legis.la.gov

**Re: Board of Elementary and Secondary Education ("BESE")
Compliance with Section 2 of the Voting Rights Act**

Dear Chair Stefanksi, Chair Hewitt, and Other Members of the House and Senate Governmental Affairs Committee:

The NAACP Legal Defense and Educational Fund, Inc. ("LDF"), Advancement Project National Office, American Civil Liberties Union of Louisiana, Black Voters Matter Fund, Fair Districts Louisiana, The Education Trust, League of Women Voters of Louisiana, Louisiana NAACP State Conference, Louisiana Progress, Our Voice Nuestra Voz, Power Coalition for Equity and Justice, Southern Louisiana Coalition for Education, Southern Poverty Law Center Action Fund, Urban League

of Louisiana, and former BESE member Linda Johnson write to urge you to adopt a map for the Louisiana Board of Elementary and Secondary Education ("BESE") with three districts comprised of a majority of minority voters ("majority-minority districts"). For the reasons explained below, Section 2 of the Voting Rights Act of 1965 ("Section 2") likely requires this body to enact a map this upcoming redistricting cycle with three majority-minority districts. Moreover, we have confirmed that it is possible to draw a BESE map with three majority-minority districts and are submitting along with this letter two such maps for your consideration.

I. Background

The BESE was established in Louisiana's 1974 Constitution as the administrative body for elementary and secondary schools, special schools for students with disabilities, and educational units in the state's correctional institutions and mental health facilities. The eleven-member board consists of three members appointed at large, and eight members elected from single-member districts ("SMDs"). Members served six-year, overlapping terms until 1984 when the terms were shortened and made concurrent with the four-year term of the Governor. Elected members were initially selected from Louisiana's then-eight congressional districts. However, when Louisiana lost one congressional district in the reapportionment process following the 1990 Census, the State created a BESE map with eight unique districts, and it has remained that size through multiple redistricting cycles.

The BESE has the authority to create policies that govern the statewide operations of public and non-public schools, to administer the budget for educational programs and services at those schools, and to conduct administrative hearings to resolve any conflict concerning its policies and actions.

It is critical that Black and Latino Louisianans have an equal opportunity to elect their preferred representatives to the BESE. Under the current map, Black and Latino Louisianans are severely underrepresented. Louisiana's population as a whole is 39.5% Black or Latino and Louisiana's population under the age of 18 (who are eligible to attend public schools in the state or will be in the coming years) is 47.5% Black or Latino. However, Black and Latino voters in Louisiana only have an opportunity to elect candidates of their choice in two of the eight SMDs (i.e., 25% of the districts). Currently, one of the three governor-appointed BESE seats is held by a person of color, so three out of 11 BESE members (27%) are people of color and/or representatives preferred by Black and Latino voters. Moreover, under the previous administration all three appointed members were white people, and, as a result, only two out of 11 BESE members (18%) were people of color and/or representatives

preferred by Black and Latino voters. In short, Black and Latino Louisianans are severely underrepresented on the BESE.

II. The Legislature Has an Obligation to Comply With Section 2 of the Voting Rights Act in Redistricting.

The state legislature has an affirmative obligation to comply with the Voting Rights Act in the redistricting process. In particular, Section 2 requires the redistricting body to ensure that voters of color have an equal opportunity “to participate in the political process and elect candidates of their choice,” taking into consideration the state or locality’s demographics, voting patterns, and other circumstances.¹ A chief purpose of Section 2 is to prohibit minority vote dilution at all levels of government.²

A district map may violate Section 2 if it dilutes the voting power of voters of color, including by “packing” Black voters into districts where they constitute an unnecessarily large percentage of the voting population and depriving them of the opportunity to elect candidates of choice in other districts.³ Section 2 prohibits minority vote dilution regardless of whether a plan was adopted with a discriminatory purpose.⁴ Indeed, Section 2 outlaws redistricting plans that result in a reduced ability of voters of color to elect candidates of their choice.

In *Thornburg v. Gingles*, 478 U.S. 30 (1986), the U.S. Supreme Court set forth three pre-conditions for assessing whether a districting plan or voting system has resulted in vote dilution. The three “*Gingles* preconditions” are whether: (1) an alternative districting plan can be drawn that includes one or more SMDs in which the minority community is sufficiently large and geographically compact to constitute a majority in the district; (2) the minority group is politically cohesive in its support for its preferred candidates; and (3) in the absence of majority-minority districts, candidates preferred by the minority group would usually be defeated due to the political cohesion of non-minority voters in support of different candidates.⁵ Together,

¹ *Thornburg v. Gingles*, 478 U.S. 30, 34 (1986).

² See *St. Bernard Citizens For Better Gov't v. St. Bernard Par. Sch. Bd.*, No. CIV.A. 02-2209, 2002 WL 2022589, at *10 (E.D. La. Aug. 26, 2002); *Fifth Ward Precinct 1A Coal. & Progressive Ass'n v. Jefferson Par. Sch. Bd.*, No. CIV.A. 86-2963, 1989 WL 3801, at *1 (E.D. La. Jan. 18, 1989).

³ See *Gingles*, 478 U.S. at 46, n.11.

⁴ *Id.* at 35.

⁵ *Id.* at 50-51.

the second and third *Gingles* preconditions are commonly referred to as racial bloc or racially polarized voting.⁶

If these three *Gingles* preconditions are met, a decisionmaker must then evaluate the “totality of circumstances” to determine whether minority voters “have less opportunity than other members of the electorate to participate in the political process and to elect representatives of their choice.”⁷ Courts consider several factors (commonly known as the “Senate Factors”) to determine whether, under the totality of the circumstances, the minority vote has been diluted impermissibly.⁸ It will be “only the very unusual case in which the plaintiffs can establish the existence of the three *Gingles* factors but still have failed to establish a violation of § 2 under the totality of circumstances.”⁹

III. A New BESE Map With Only Two Majority-Minority Districts Likely Violates Section 2.

A new BESE map will likely violate Section 2 if it fails to provide Louisiana’s Black and Latino voters with an equal opportunity to elect candidates of their choice through the development of three districts comprised of a majority of Black and Latino voters. For the reasons explained below, each of the three *Gingles* preconditions are likely present in Louisiana, and there is ample evidence to show that under the totality of the circumstances, Black and Latino voters have less opportunity than other members of the electorate to participate in the political process and elect candidates of their choice to the BESE.

⁶ Racially polarized voting occurs when there is a pattern of different racial groups voting for different candidates. In a racially polarized election, for example, Black people vote together for their preferred (frequently Black) candidate, and most non-Black voters vote for the opposing (typically white) candidate.

⁷ 52 U.S.C. § 10301(b); *League of United Latin Am. Citizens v. Perry*, 548 U.S. 399, 425 (2006).

⁸ Courts examine the “totality of the circumstances” based on the so-called “Senate Factors,” named for the Senate Report accompanying the 1982 Voting Rights Act amendments in which they were first laid out. *Gingles*, 478 U.S. at 43-45. The Senate Factors are: (1) the extent of any history of discrimination related to voting; (2) the extent to which voting is racially polarized; (3) the extent to which the state or political subdivision uses voting practices that may enhance the opportunity for discrimination; (4) whether minority candidates have access to candidate slating processes; (5) the extent to which minority voters bear the effects of discrimination in areas of life like education, housing, and economic opportunity; (6) whether political campaigns have been characterized by overt or subtle racial appeals; (7) the extent to which minority people have been elected to public office; (8) whether elected officials are responsive to the needs of minority residents; and (9) whether the policy underlying the voting plan is tenuous. *Id.* at 36-37. However, “there is no requirement that any particular number of factors be proved, or that a majority of them point one way or the other.” *Id.* at 45.

⁹ *Clark v. Calhoun Cty.*, 21 F.3d 92, 97 (5th Cir. 1994).

a. *Gingles* Precondition One: It Is Possible to Draw a BESE Map With Three Majority-Minority Districts.

We have confirmed that there are multiple ways to draw three majority-minority districts in the eight-district BESE map. **Appendix 1** provides an illustrative map that contains three districts in which the combined Black and Latino voting-age population ("BVAP" and "LVAP") is over 50%.¹⁰ The map proposed in Appendix 1 is also more compact than the current map according to the widely accepted Polsby-Popper compactness measure and it splits fewer parish boundaries than the current map.

The current BESE map cracks Black and Latino communities in Northern Louisiana into districts 4 and 5, denying voters of color in Northern Louisiana any opportunity to elect candidates of their choice in either of those districts. The proposed map creates a new version of District 5 that unifies these communities in Northern Louisiana with a new district in which the combined BVAP and LVAP is over 50%.

In addition, to the extent the Legislature wishes to consider a map that retains traditional district alignments to the extent practicable, we also are providing an alternate proposal for the BESE map that keeps all districts largely intact, other than districts 4 and 5 in Northern Louisiana (see **Appendix 2**).¹¹ This map incorporates the same third majority-minority district in northern Louisiana as the map presented in Appendix 1, but adjusts the boundaries of the other six districts only as needed to ensure population equality. This map illustrates an alternate approach to ensuring that Black and Latino voters have their voices heard in elections to the BESE.

Accordingly, because it is possible to adopt a BESE map with three majority-minority districts, the first *Gingles* precondition could readily be satisfied.¹²

¹⁰ The Fifth Circuit has confirmed that Section 2 protects coalitions of Black and Latino voters who, when combined, would constitute a majority in a single-member district. See *Campos v. City of Baytown, Tex.*, 840 F.2d 1240 (5th Cir. 1988); *League of United Latin Am. Citizens Council, No. 4386 v. Midland Indep. Sch. Dist.*, 812 F.2d 1494 (5th Cir. 1987), vacated on other grounds, 829 F.2d 546 (5th Cir. 1987).

¹¹ House Concurrent Resolution 90 ("HCR 90"), which sets forth redistricting principles for the Committee's consideration, advises that "[d]ue consideration shall be given to traditional alignments to the extent practicable. HCR 90, Joint Rule No. 21(D)(4). However, as acknowledged in HCR 90, compliance with Section 2 of the Voting Rights and other federal laws is a higher priority than other considerations such as traditional district alignments.

¹² See *Gingles*, 478 U.S. at 50.

b. *Gingles* Preconditions Two and Three: Louisiana Elections Reflect Racially Polarized Voting Patterns.

There is ample evidence to suggest that the second and third *Gingles* preconditions are likely satisfied due to Louisiana's well-documented history and ongoing record of racially polarized voting in elections across the state. For example, over the past three decades, numerous federal courts have found that racially polarized voting pervades Louisiana statewide and local elections.¹³ Additionally, in the past two decades—including as recently as this year—the Department of Justice (“DOJ”) has sued local parishes under Section 2 three times; in each case, the DOJ identified racially polarized voting patterns within the parish.¹⁴

c. Totality of Circumstances: Voters of Color Have Less Opportunity to Elect Candidates of Their Choice to the BESE.

In addition to the indicia of the three *Gingles* preconditions, under the totality of the circumstances, Black and Latino voters have less opportunity than other members of the electorate to participate in the political process and to elect representatives of their choice to the BESE.¹⁵ There is ample evidence that several of

¹³ A district court recently found that there was sufficient preliminary evidence of racially polarized voting statewide to support plaintiffs' challenge to Louisiana's Supreme Court district map. *Louisiana State Conference of NAACP v. Louisiana*, 490 F. Supp. 3d 982, 1019 (M.D. La. 2020). In *St. Bernard Citizens For Better Government*, the district court found racially polarized voting patterns in statewide gubernatorial elections, as well as local parish elections. *St. Bernard Citizens For Better Gov't*, 2002 WL 2022589, at *7 (E.D. La. Aug. 26, 2002). See, e.g., *Terrebonne Par. Branch NAACP v. Jindal*, 274 F. Supp. 3d 395, 436-37 (M.D. La. 2017), *rev'd sub nom. Fusilier v. Landry*, 963 F.3d 447 (5th Cir. 2020) (The district court found that there were racially polarized voting patterns in the parish's judicial elections, and although the Fifth Circuit reversed the district court's decision, it held that the district court did not err in its finding of racially polarized voting); *Citizens for a Better Gretna v. City of Gretna*, 636 F. Supp. 1113, 1124 (E.D. La. 1986); *Major v. Treen*, 574 F. Supp. 325, 337 (E.D. La. 1983) (The court found that there was racial polarization in Orleans Parish).

¹⁴ Most recently, in 2021, the DOJ sued the City of West Monroe under Section 2 over its at-large alderman elections. The DOJ contended that there was racially polarized voting sufficient to satisfy *Gingles* because “[i]n contests between Black candidates and White candidates for West Monroe Board of Alderman and other parish, state, and federal positions, White voters cast their ballots sufficiently as a bloc to defeat the minority's preferred candidate.” The court agreed and entered a consent decree between the parties. *United States v. City of West Monroe*, No. 21-cv-0988 (W.D. La. Apr. 14, 2021); see also *United States v. City of Morgan*, No. 00-cv-1541 (W.D. La. Aug. 17, 2000) (“Racially polarized voting patterns prevail in elections for the City Council of Morgan City. In contests between [B]lack and white candidates for City Council, [B]lack voters consistently vote for [B]lack candidates and white voters vote sufficiently as a bloc to usually defeat the [B]lack voters' candidates of choice.”); *Greig v. City of St. Martinville*, No. 00-cv-00603 (W.D. La. Jun. 3, 2000) (The DOJ asserted that “[e]lections in the City of St. Martinville are racially polarized”).

¹⁵ *Gingles*, 478 U.S. at 36-37 (quoting 42 U.S.C. § 10301(b)).

the congressionally-delineated “Senate Factors” can be demonstrated including: the extent of the history of voting discrimination in Louisiana (Factor 1); the extent of racially polarized voting in Louisiana (Factor 2); the extent to which Black and Latino voters bear the effects of discrimination in a variety of areas of life, including in education (Factor 5); the extent to which Black and Latino candidates have been elected to statewide, public office in Louisiana (Factor 7); and whether elected members of the BESE are responsive to the needs of Black and Latino residents (Factor 8).¹⁶ For example:

- Factor 1: The state of Louisiana has an extensive history and ongoing record of voting discrimination that has adversely impacted the right of Black and other minority voters to register to vote, to vote, or otherwise to participate in the political process.¹⁷ Since Reconstruction, Louisiana has passed countless laws to deny Black democratic participation, including grandfather clauses, poll taxes, and educational and property qualifications.¹⁸
- Factor 1: Louisiana has a long history and ongoing record of employing voting practices, such as at-large elections and redistricting, that have diluted the weight of votes cast by voters of color. Most recently, the DOJ successfully challenged the City of West Monroe’s at-large alderman elections under Section 2.¹⁹ From the passage of the Voting Rights Act in 1965 until the Supreme Court’s *Shelby County v. Holder* decision in 2013, the DOJ blocked nearly 150 proposed changes to voting policies or practices in Louisiana on the grounds that they discriminated against voters of color.²⁰ The DOJ even issued an objection letter pursuant to Section 5 to the redistricting plan proposed for the BESE in 1991.²¹
- Factor 1: In public hearings conducted by the Louisiana Advisory Committee to the U.S. Commission on Civil Rights in November and December 2017,

¹⁶ See *supra* note 12 (listing the Senate Factors).

¹⁷ *St. Bernard Citizens For Better Gov’t*, 2002 WL 2022589, at *9 (quoting *Citizens for a Better Gretna*, 636 F. Supp. at 1124) (“The history of black citizens’ attempts, in Louisiana since Reconstruction, to participate effectively in the political process and the white majority’s resistance to those efforts is one characterized by both *de jure* and *de facto* discrimination. Indeed, it would take a multi-volumed treatise to properly describe the persistent, and often violent, intimidation visited by white citizens upon black efforts to participate in Louisiana’s political process.”)

¹⁸ Debo P. Adegbile, *Voting Rights in Louisiana: 1982 -2006*, 17 S. Cal. Rev. L. & Soc. Just. 416-418 (2008).

¹⁹ See *United States v. City of West Monroe*, No. 21-cv-0988 (W.D. La. Apr. 14, 2021).

²⁰ See *Voting Determination Letters for Louisiana*, Department of Justice, <https://www.justice.gov/crt/voting-determination-letters-louisiana> (last accessed Aug. 25, 2021).

²¹ See *Objection Letter Regarding Act No. 651 (1991)*, United States Department of Justice (Oct. 1, 1991), <https://www.justice.gov/sites/default/files/crt/legacy/2014/05/30/LA-1770.pdf>.

voting rights advocates testified that due to the state's failure to train and inform poll workers and registrars, Latino voters face substantial barriers to voting in Louisiana.²² According to this testimony: (1) Latino voters are not being advised of their rights under state law as it relates to voting as a naturalized citizen; and (2) election officials are not advising them of their right, under federal law, to bring someone to the voting booth with them to help translate to vote if necessary.²³

- Factor 2: As explained above, it is indisputable that there is RPV in Louisiana elections at the state and local level.
- Factor 5: Black and Latino Louisianans continue to experience the brunt of racial discrimination in every sector of public life.²⁴ Black and Latino Louisianans experience higher unemployment rates than white Louisianans. Unemployment data at the end of 2019 shows that Black people were unemployed at a rate of 7.9% and Latino people at a rate of 5.9%, compared to 3.1% for white people.²⁵ Black and Latino Louisianans also experience socioeconomic disparities as a result of systemic discrimination. In 2019, 29.4% of Black Louisianans and 25.3% of Latino Louisianans lived below the poverty line, compared to 12.5% of white people.²⁶
- Factor 7: Black and Latino people have been largely underrepresented in Louisiana public offices.²⁷ Louisiana has never had a Black or Latino U.S. Senator, has never had a Latino governor since becoming a state in 1812, and has not had a Black governor since Reconstruction. Louisianans rarely elect

²² *Barriers to Voting in Louisiana*, Louisiana Advisory Committee for the United States Commission on Civil Rights (June 2018), <https://www.usccr.gov/files/pubs/2018/08-20-LA-Voting-Barriers.pdf>.

²³ *Id.*

²⁴ "Congress and the Courts have recognized the effect lower socio-economic status has on minority participation in the political process." *Id.* In *Citizens for a Better Gretna*, the court found that "depressed levels of income, education and employment are a consequence of severe historical disadvantage" that in turn engenders "depressed levels of participation in voting and candidacy." 636 F. Supp. at 1120.

²⁵ *State unemployment by race and ethnicity*, Economic Policy Institute, <https://www.epi.org/indicators/state-unemployment-race-ethnicity-2019q4/> (last updated March 2020).

²⁶ *Poverty Rate by Race/Ethnicity*, KFF, <https://www.kff.org/other/state-indicator/poverty-rate-by-raceethnicity/?currentTimeframe=0&sortModel=%7B%22colId%22:%22Location%22,%22sort%22:%22asc%22%7D> (last accessed Sep. 1, 2021).

²⁷ The U.S. Supreme Court has held that one of the "predominant" factors under Section 2 is "the extent to which members of the minority group have been elected to public office in the jurisdiction." *Gingles*, 478 U.S. at 37; see also *Citizens for a Better Gretna*, 636 F. Supp. at 1120 ("Where members of the minority group have not been elected to public office, it is of course evidence of vote dilution.")

Black and Latino candidates to Congress. The state has had only five Black Congresspeople since Reconstruction, all of whom were elected to represent majority Black districts;²⁸ and has only elected two Latino Congresspeople, the last of whom served until 1941.²⁹ By contrast, since the Voting Rights Act was adopted in 1965, Louisiana has sent 46 white representatives to Congress.³⁰

- Factor 8: The BESE has been unresponsive to the particularized needs of Black and Latino families. For example, the BESE supported removing COVID-19 safety protocols, including a statewide mask mandate in schools,³¹ notwithstanding the existence of severe racial disparities in COVID-19 – although only one-third of Louisiana’s population, Black people accounted for more than 70% of the people who died of COVID-19.³²
- Factor 8: The BESE is currently revising statewide social studies curriculum standards **to address gaps in the existing curriculum**, and there are concerns from parents and educators that the BESE’s decision-making will be influenced by politicized distortions on the teaching of full and accurate history in Louisiana’s schools, including the impact that legally-sanctioned enslavement of Black people and other institutions of racial oppression have had on Black and Latino communities.³³
- Factor 8: Louisiana is one of the few states in the country that requires high school seniors to pass a state test, the Louisiana Educational Assessment

²⁸ Four of the Black Congresspeople were elected in large part due to Black voter support in District 2. See *Black-American Members by State and Territory, 1870-Present*, History, Art & Archives: United States House of Representatives, <https://history.house.gov/Exhibitions-and-Publications/BAIC/Historical-Data/Black-American-Representatives-and-Senators-by-State-and-Territory/> (last visited Dec. 29, 2021).

²⁹ See *Hispanic Americans in Congress*, History, Art & Archives: United States House of Representatives, <https://history.house.gov/People/Search?filter=11> (last visited Dec. 29, 2021).

³⁰ See *United States Congressional Delegations from Louisiana*, Ballotpedia, https://ballotpedia.org/United_States_congressional_delegations_from_Louisiana (last visited Dec. 29, 2021).

³¹ *Statement from BESE President regarding Governor’s lifting of statewide mask mandate in K-12 schools*, Louisiana State Board of Elementary and Secondary Education (May 25, 2021) <https://bese.louisiana.gov/about-bese/bese-news/2021/05/26/statement-from-bese-president-regarding-governor's-lifting-of-statewide-mask-mandate-in-k-12-schools>.

³² *Black Communities Are Hit Hardest By COVID-19 In Louisiana And Elsewhere*, New Orleans Public Radio, (Apr. 6, 2020), <https://www.wwno.org/latest-news/2020-04-06/black-communities-are-hit-hardest-by-covid-19-in-louisiana-and-elsewhere>.

³³ JC Canicosa, *Louisiana parents, teachers raise concerns about critical race theory in social studies standards*, Louisiana Illuminator (Dec. 13, 2021 7:27 pm) <https://lailluminator.com/2021/12/13/louisiana-parents-teachers-raise-concerns-about-critical-race-theory-in-social-studies-standards/>.

Program (LEAP), in order to graduate.³⁴ This requirement has presented a particularized barrier to graduation for students who primarily speak a language different from that of English, or English Language Learners (ELL students). As a result of this requirement, even though Louisiana's overall graduation rate is 80%, the graduation rate among ELL students was only 41%.³⁵ ELL students in Louisiana, who are mostly Latino,³⁶ have one of the lowest graduation rates for ELL students in the country.³⁷ Notably, when LEAP testing was suspended due to the pandemic, the graduation rate for ELL students increased significantly. However, notwithstanding requests from advocates, the BESE has not adopted alternative pathways to graduation for ELL students on a permanent basis.³⁸

- Factor 8: Louisiana's K-12 accountability system, which assigns a School Performance Score ("SPS") to public schools and school districts, is set by the BESE and impacts the funding and the overall viability of schools.³⁹ Leaders of majority-Black and Latino or economically-disadvantaged schools have raised concerns that the state's existing accountability metrics do not account for systemic issues that these communities often face that may adversely impact academic outcomes. The BESE has not yet adopted accountability systems that would address these concerns, despite being presented with such a proposal by Louisiana Department of Education Superintendent Dr. Cade Brumley in June 2021.⁴⁰

³⁴ Jennifer Crocket, *Coalition pushes for this COVID-19 change in Louisiana high schools to stay put*, WDSU (Nov. 29, 2021, 5:20 PM), Coalition pushes for this COVID-19 change in Louisiana high schools to stay put (wdsu.com).

³⁵ *Id.*

³⁶ *A Look at English Learners in Louisiana*, Univ. of La. Monroe (Oct. 10, 2018), <https://online.ulm.edu/articles/education/english-learners-in-louisiana.aspx>.

³⁷ Claudio Sanchez, *English Language Learners: how your state is doing*, NPR (Feb. 23, 2017, 6:00 am), <https://www.npr.org/sections/ed/2017/02/23/512451228/5-million-english-language-learners-a-vast-pool-of-talent-at-risk>.

³⁸ Aubri Juhasz, *Louisiana's English Learners Rarely Graduate on Time. These Educators Want to Change the Criteria*, WWNO (Oct. 22, 2021, 1:49 PM), <https://www.wwno.org/education/2021-10-22/louisianas-english-learners-rarely-graduate-on-time-these-educators-want-to-change-the-criteria>.

³⁹ See generally, *BESE's Responsibility*, Louisiana State Board of Elementary and Secondary Education, <https://bese.louisiana.gov/about-bese/bese's-responsibility>; *Louisiana's K-12 Accountability System*, Louisiana Department of Education, https://www.louisianabelieves.com/docs/default-source/key-initiatives/louisianas-key-initiatives_k-12-accountability-system.pdf?sfvrsn=7.

⁴⁰ Will Sentell, *This Plan Would Give Fewer Louisiana Schools Failing Grades It's Running Into Opposition*, The Advocate (June 14, 2021, 2:45 PM),

There is strong evidence based on the totality of circumstances that Black and Latino voters have less opportunity to participate in the political process and elect candidates of their choice to the BESE.

IV. The Louisiana State Legislature Can and Must Enact a BESE Map with Three Majority-Minority Districts.

For the reasons explained above, the state Legislature must earnestly consider its obligations under the Voting Rights Act and adopt a BESE map with three majority-minority districts to ensure Black and Latino voters' right to an equal opportunity to elect candidates of their choice. A failure by the Legislature to comply with Section 2 may lead to costly and unnecessary litigation.⁴¹ We therefore urge the Legislature to consider districting plans that ensure non-dilution of Black and Latino voting strength in BESE elections, including the maps we have provided in in this letter.

We have also submitted comma-delimited block equivalency files for the maps proposed in the appendices to this letter.

Please feel free to contact LDF Redistricting Counsel Michael Pernick at (917) 790-3597 or by email at mpernick@naacpldf.org with any questions or to discuss these issues in more detail.

Sincerely,

/s/ Michael Pernick

Michael Pernick
Leah C. Aden, Deputy Director of Litigation
Stuart Naifeh, Manager of the Redistricting Project
Jared Evans
Victor M. Jones
Victoria Wenger
NAACP Legal Defense & Educational Fund,

https://www.theadvocate.com/baton_rouge/news/education/article_43ab6964-cd15-11eb-8eb2-1b93cfbe337a.html.

⁴¹ See NAACP Legal Defense and Educational Fund, Inc., *The Cost (in Time, Money, and Burden) of Section 2 of the Voting Rights Act Litigation as of September 2021*, NAACP Legal Defense and Educational Fund <https://www.naacpldf.org/wp-content/uploads/Section-2-costs-9.19.21-Final.pdf> (last visited Dec. 12, 2021).

Inc.
40 Rector Street, 5th Fl.
New York, NY 10006

Judith Browne Dianis, Executive Director
Gilda Daniels, Director of Litigation
Jennifer Lai-Peterson
Advancement Project National Office

Alanah Odoms, Executive Director
Chris Kaiser, Advocacy Director
Megan Snider, Staff Attorney
ACLU of Louisiana
P.O. Box 56157
New Orleans, LA 70156-6157

Omari Ho-Sang, State Organizing Manager –
Louisiana
Keturah Butler-Reed, Southern Region Organizer –
Louisiana
Black Voters Matter Fund

Tramelle D. Howard, J.D.
State Director
The Education Trust

Stephen Kearny
Organizer
Fair Districts Louisiana

Linda Johnson
Former BESE Member

Hilda Walker Thomas
President
League of Women Voters of Louisiana

Peter Robins-Brown
Policy & Advocacy Director

Louisiana Progress

Michael McClanahan
President
NAACP Louisiana State Conference

Mary Moran, Executive Director
Taylor Castillo, Program Director
Our Voice Nuestra Voz

Ashley Shelton, Executive Director
Candice Battiste
Janea Jamison
Morgan Shannon
Power Coalition for Equity and Justice
4930 Washington Ave.
New Orleans, LA 70125

Kristen Smith
Southern Louisiana Coalition for Education

Terry C. Landry Jr., Policy Director – Louisiana
Chandra Shae Foster, Policy Associate
Southern Poverty Law Center Action Fund
201 St. Charles Avenue
Suite 2000
New Orleans, LA 70170
Liza Weisberg, Staff Attorney
P.O. Box 1287
Decatur, GA 30031

Judy Reese Morse
President and CEO
Urban League of Louisiana
4640 S. Carrollton Avenue
New Orleans, LA 70119

NAACP Legal Defense and Educational Fund, Inc. ("LDF")

Since its founding in 1940, LDF has used litigation, policy advocacy, public education, and community organizing strategies to achieve racial justice and equity in education, economic justice, political participation, and criminal justice. Throughout its history, LDF has worked to enforce and promote laws and policies that increase access to the electoral process and prohibit voter discrimination, intimidation, and suppression. LDF has been fully separate from the National Association for the Advancement of Colored People ("NAACP") since 1957, though LDF was originally founded by the NAACP and shares its commitment to equal rights.

Advancement Project National Office

Advancement Project is a next generation, multi-racial civil rights organization. Rooted in the great human rights struggles for equality and justice, we exist to fulfill America's promise of a caring, inclusive and just democracy. We use innovative tools and strategies to strengthen social movements and achieve high impact policy change.

American Civil Liberties Union of Louisiana

The ACLU of Louisiana has worked to advance and preserve the individual rights and liberties guaranteed by the Constitution and laws of the United States and the State of Louisiana since 1956. The organization is part of a nationwide network of ACLU affiliates that fight tirelessly in all 50 states, Puerto Rico, and Washington, D.C.

Black Voters Matter Fund

The Black Voter's Matter Fund believes in the value of the voter 365. In this vein not only do we support our partners voting rights during and in between elections, we also support capacity and power building all year long.

The Education Trust

The Education Trust is a national nonprofit that works to close opportunity gaps that disproportionately affect students of color and students from low-income families. Through our research and advocacy, Ed Trust supports efforts that expand excellence and equity in education from preschool through college, increase college access and completion particularly for historically underserved students, engage diverse communities dedicated to education equity, and increase political and public will to act on equity issues.

Fair Districts Louisiana

Fair Districts Louisiana is a grassroots, non-partisan alliance of citizens advocating for redistricting and voting reform.

League of Women Voters of Louisiana

The League of Women Voters of Louisiana is a nonpartisan political organization encouraging informed and active participation in government. It influences public policy through education and advocacy.

Louisiana Progress

Louisiana Progress is dedicated to informing, engaging, and mobilizing people across Louisiana--community leaders, activists, advocates, students, and policymakers--with the goal of working together to support solutions-driven public policies that help build a better Louisiana for everyone.

Louisiana NAACP State Conference

Louisiana State Conference of the National Association for the Advancement of Colored People (the "Louisiana NAACP State Conference") is a state subsidiary of the National Association for the Advancement of Colored People, Inc. For decades, the Louisiana NAACP State Conference has worked towards its mission to ensure the political, educational, social, and economic equality of all persons and to eliminate race-based discrimination.

Our Voice Nuestra Voz

Our Voice Nuestra Voz is a nation-building organization, anchoring indigeneity while building Black and Brown solidarity in New Orleans. We work to remember our shared culture and language, reconnect to the land, and organize our community around collective action to create a world for Black and Brown people to love, live, and thrive.

Power Coalition for Equity and Justice

We are a coalition of community-based organizations who work together to educate and empower voters across Louisiana. Through our voter engagement and community organizing work, we seek to unify our collective voices into a stronger, more cohesive force that can successfully advocate for an agenda of shared values and issues.

Our work is diverse and includes power mapping, listening sessions, organizing, voter engagement, policy advocacy, and leadership development. It is centered on creating spaces where community can come together to lift up the issues that impact them, and then connect those issues to local, regional, and national resources—including the state voter file—to move our shared agenda.

South Louisiana Coalition for Education (SLCE)

South Louisiana Coalition for Education (SLCE) was formed in 2015 by a group of community educators that noticed something concerning: the policy decisions being made on behalf of our students needed greater input from those with a direct stake in schools. To this end, we began organizing in the communities we served with one goal: to get input from people that worked with schools, then use that to drive a student-centered policy agenda and help put students back at the forefront of policy decisions.

SLCE members are current & former teachers and school staff, parents, family members, students, and others with a shared desire to ensure that our schools are as excellent as possible for students. We hail from many different geographical locations, political affiliations, religious traditions, and even schools of thought on educational theory, but we share a thorough belief that this diversity of thought and experience makes our coalition stronger and allows us to achieve the strongest possible outcomes for students.

Since our initial formation, we have used House Meetings, Public Actions, Teach-Ins, and other organizing strategies to engage thousands of individuals across South Louisiana in the process of making our schools stronger for students.

Southern Poverty Law Center Action Fund

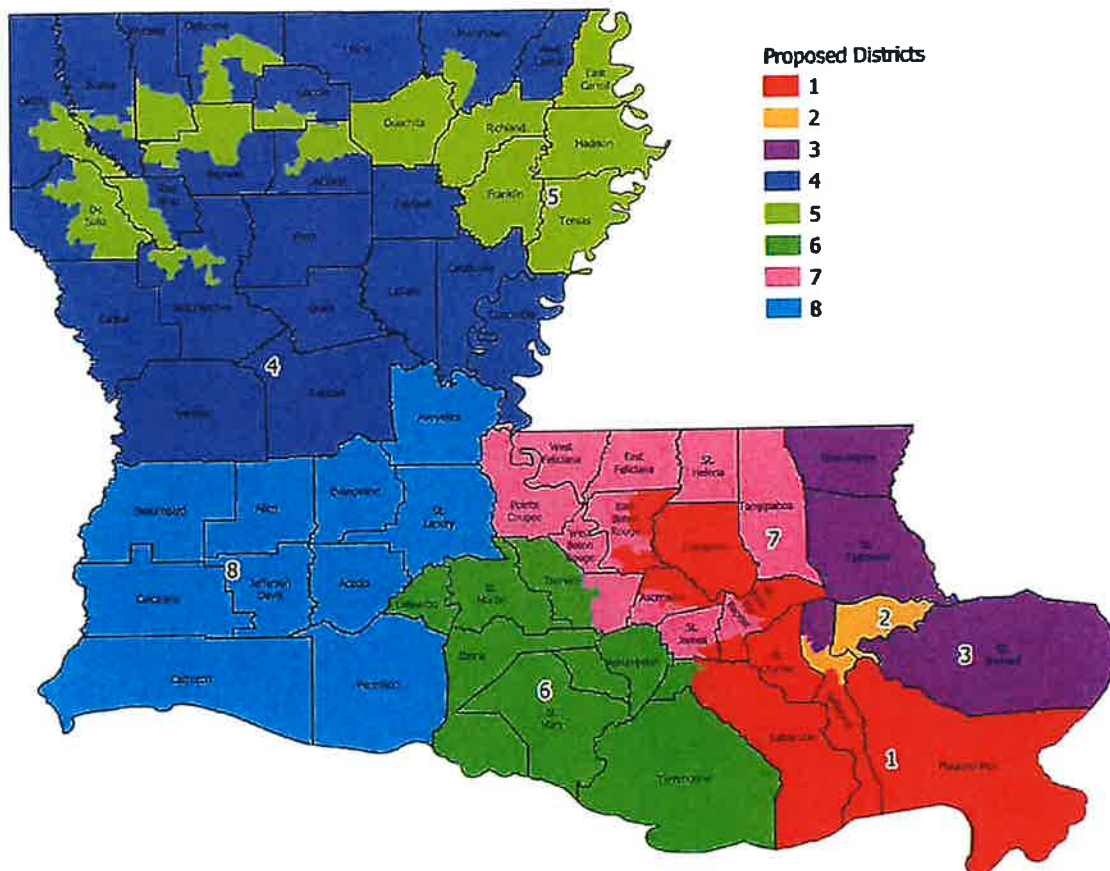
SPLC Action is a catalyst for racial justice in the South and beyond, working in partnership with communities to dismantle white supremacy, strengthen intersectional movements, and advance the human rights of all people.

Urban League of Louisiana

The Urban League of Louisiana's mission is to assist African Americans and other communities seeking equity to secure economic self-reliance, parity, and civil rights. As an affiliate of the National Urban League, and for over 83 years, the Urban League of Louisiana has worked to ensure quality education, equal employment, entrepreneurial opportunities, economic inclusion, and shared dignity under the law.

APPENDIX 1

Louisiana State Board of Elementary and Secondary Education (BESE) Proposed Districts



APPENDIX 1-A

District	Total	Deviation	% Deviation	VAP	Black VAP	% Black VAP	Latino VAP	% Latino VAP	NH Black & Latino VAP	% NH Black & Latino VAP
1	606,007	23,787	4.09%	461,274	69,054	14.97%	28,044	6.08%	96,190	20.85%
2	577,285	-4,935	-0.85%	453,053	233,598	51.56%	43,871	9.68%	271,323	59.89%
3	586,038	3,818	0.66%	455,095	67,409	14.81%	52,984	11.64%	118,335	26.00%
4	575,569	-6,651	-1.14%	442,765	94,272	21.29%	19,115	4.32%	112,513	25.41%
5	557,693	-24,527	-4.21%	423,959	202,317	47.72%	14,457	3.41%	215,502	50.83%
6	582,785	565	0.10%	443,349	115,153	25.97%	24,016	5.42%	138,114	31.15%
7	588,911	6,691	1.15%	451,739	227,711	50.41%	24,139	5.34%	250,127	55.37%
8	583,469	1,249	0.21%	439,314	106,220	24.18%	17,036	3.88%	122,225	27.82%

* Black VAP represents Black Alone and In Part, including Latinos. See United States Census Bureau, P.L. 94-171 File, Table 3.

* Latino VAP represents all Latinos. See United States Census Bureau, P.L. 94-171 File, Table 4.

* NH Black VAP represents Black Alone and In Part, excluding Latinos. See United States Census Bureau, P.L. 94-171 File, Table 4.

* Ideal population is 582,220.